Columbia County, GA



Title VI Plan

Adopted: November 18, 2014

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Columbia County ii

1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

Columbia County assures the Georgia Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, Federal Transit Laws, 49 CFR Part 21 Unlawful Discrimination, Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation and as per written guidance under FTA Circular 4702.1B, dated October 2012, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

Columbia County further agrees to the following responsibilities with respect to its programs and activities:

- 1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
- 2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.
- 3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
- 4. Develop a complaint process and attempt to resolve complaints of discrimination against Columbia County.
- 5. Participate in training offered on the Title VI and other nondiscrimination requirements.
- 6. If reviewed by GDOT or any other state or federal regulatory agency, take affirmative action steps to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
- 7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
- 8. Submit the information required by FTA Circular 4702.1B to the GDOT. (refer to Appendix A of this plan)

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Printed Name: Ron C. Cross 11/18/2014
Chairman, Columbia County Board of Commissioners Date

2.0 Introduction & Description of Services

Columbia County submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

Columbia County is a sub-recipient of federal funds and provides service in Columbia County, GA. A description of the current Columbia County system is included in Appendix B.

Title VI Liaison

Marcia Lowry
Columbia County Board of Commissioners
County Administration
Human Resources Manager/EEO
706-868-3300
630 Ronald Reagan Drive, Building B, Evans, GA 30809

Alternate Title VI Contacts

Don Barrow Jeff Asmann

Columbia County Board of Commissioners Columbia County Board of Commissioners

Engineering Division, Emergency & Operations Division,

Road Construction Department Public Transit Department

706-447-7600 706-556-0807

P O Box 498, Evans, GA 30809 5913 Euchee Creek Drive, Grovetown, GA 30813

Columbia County must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by GDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

Columbia County is not a first time applicant for FTA/GDOT funding. The following is a summary of Columbia County's current and pending federal and state funding.

Current and Pending FTA Funding

None

Current and Pending GDOT Funding

- 1. Transportation Operating Assistance, FY2014, \$196,888, Current
- 2. Transportation Capital Assistance, FY2014, \$39,632, Current
- 3. Transportation Operating Assistance, FY2015, \$213,656, Pending
- 4. Transportation Capital Assistance, FY2015, \$80,307, Pending
- 5. UMTA/Transit Operating Assistance, FY2014, \$104,274, Current
- 6. UMTA/Transit Operating Assistance, FY2014, \$18,949, Current
- 7. Green Space, FY2014, \$250,000, Current
- 8. GATEway Grant, FY2014, \$27,000, Current

<u>Current and Pending Federal Funding (non-FTA)</u>

- 1. US Homeland Security CERT, FY2013, \$8,000, Current
- 2. Hazard Mitigation Planning Grant, FY2014, \$69,900, Pending
- 3. DOJ Bulletproof Vest, FY2014, \$1,230, Current

<u>Current and Pending State Funding (non-GDOT)</u>

- 1. GEMA Hazardous Materials Emergency Preparedness Grant, FY2014, \$5,000, Current
- 2. GEMA Performance Partnership Agreement, FY2014, \$37,216, Current
- 3. GEMA Public Assistance Disaster Grant, FY2014, \$7,642,726.53, Current
- 4. DHR Coordinated Transportation, FY2014, \$125,000, Current
- 5. GA Department of Community Affairs, \$60,000, FY2002, Current

During the previous three years, GDOT did not complete a Title VI compliance review of Columbia County. Columbia County has not been found to be in noncompliance with any civil rights requirements.

2.2 Annual Certifications and Assurances

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Columbia County will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on May 4, 2015. The Plan was approved and adopted by Columbia County's Board of Commissioners during a meeting held on November 18, 2014. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

A sample of the notice is included in Appendix D of this Plan. The sample notice should be translated into other languages, as necessary.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Columbia County's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Columbia County's office(s) including the reception desk and meeting rooms, and on the Columbia County's website at www.columbiacountyga.gov. Additionally, Columbia County will post the notice at stations, stops and on transit vehicles.

A sample version of this notice is included in Appendix D of this Plan along with any translated versions of the notice, as necessary.

4.0 Title VI Procedures and Compliance

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.

4.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Columbia County may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Columbia County investigates complaints received no more than 180 days after the alleged incident. Columbia County will process complaints that are complete.

Once the complaint is received, Columbia County will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Columbia County has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Columbia County may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, Columbia County can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public on Columbia County's website (www.columbiacountyga.gov).

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on Columbia County's website (www.columbiacountyga.gov).

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients (GDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Columbia County will

submit Title VI Plans to GDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

4.4 Sub-recipient Assistance and Monitoring

Columbia County does not have any sub-recipients to provide monitoring and assistance to. As a sub-recipient to GDOT, Columbia County utilizes the sub-recipient assistance and monitoring provided by GDOT, as needed. In the future, if Columbia County has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.]

4.5 Sub recipients and Subcontractors

Columbia County is responsible for ensuring that subcontractors (TPOs) are in compliance with Title VI requirements. Sub recipients may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. Columbia County, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

- Compliance with Regulations: The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
- 2. Nondiscrimination: The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
- 3. Solicitations for Subcontractors, including Procurements of Materials and Equipment: In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the

- Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
- 4. Information and Reports: The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Georgia Department of Transportation and/or the Federal Transit Administration*, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Georgia Department of Transportation*, and/or the *Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.
- 5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Columbia County shall impose contract sanctions as appropriate, including, but not limited to:
 - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
- 6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Columbia County, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

As a condition of your agreement with GDOT, Columbia County and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. Columbia County and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of GDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

E-Verify

As a condition of your agreement with GDOT, vendors and contractors of Columbia County shall utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with Columbia County. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Columbia County shall likewise utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for Columbia County.

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), Columbia County must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Columbia County in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to GDOT.

Columbia County has had <u>no</u> investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. Therefore, the summary for lists in Table 1 below has no data.

Table 1: Summary of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for Columbia County was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Columbia County. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Columbia County services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts

Columbia County is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of Columbia County's recent, current, and planned outreached activities.

- Columbia County actively advises the public of opportunities to influence policy by participation in regularly scheduled Commission meetings held throughout the year
- Commission meetings are regularly publicized in local media and through public service announcements
- Columbia County has established and maintained a local 3-1-1 call service center to allow for public input and information gathering through a formal system of incident tracking and complaint resolution

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

Columbia County operates a transit system within Columbia County, GA. The Language Assistance Plan (LAP) has been prepared to address Columbia County's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Columbia County's service area there are 4,657 residents or 4.00% who describe themselves as not able to communicate in English very well (Source: US Census). Columbia County is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Columbia County has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Columbia County does not have a transit-related committee or board, therefore this requirement does not apply.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

Title 49 CFR, Appendix C, Section (3)(iv) requires that "the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, Columbia County will ensure the following:

- Columbia County will complete a Title VI equity analysis for any facility during the planning stage with
 regard to where a project is located or sited to ensure the location is selected without regard to race,
 color, or national origin. Columbia County will engage in outreach to persons potentially impacted by the
 siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting
 alternatives, and the analysis must occur before the selection of the preferred site.
- 2. When evaluating locations of facilities, Columbia County will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
- 3. If Columbia County determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Columbia County may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Columbia County must demonstrate and document how both tests are met. Columbia County will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Columbia County has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Columbia County does not have any Title VI Equity Analysis reports to submit with this Plan. Columbia County will utilize the demographic maps included in Appendix I for future Title VI analysis.

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Columbia County is not a fixed route service provider.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
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APPENDIX K	TEXT FORMATTING PALETTE

Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Subrecipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements

All recipients must submit:

	Title VI Notice to the Public, including a list of locations where the notice is posted
	Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI
	discrimination complaint)
	Title VI Complaint Form
	List of transit-related Title VI investigations, complaints, and lawsuits
	Public Participation Plan, including information about outreach methods to engage minority
	and limited English proficient populations (LEP), as well as a summary of outreach efforts
	made since the last Title VI Program submission
	Language Assistance Plan for providing language assistance to persons with limited English
	proficiency (LEP), based on the DOT LEP Guidance
	A table depicting the membership of non-elected committees and councils, the membership
	of which is selected by the recipient, broken down by race, and a description of the process
	the agency uses to encourage the participation of minorities on such committees
	Primary recipients shall include a description of how the agency monitors its sub-recipients
	for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
	A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle
	storage facility, maintenance facility, operation center, etc.
	A copy of board meeting minutes, resolution, or other appropriate documentation showing
	the board of directors or appropriate governing entity or official(s) responsible for policy
	decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate
	governing entity is the State's Secretary of Transportation or equivalent. The approval must
_	occur prior to submission to FTA.
	Additional information as specified in Chapters IV, V, and VI, depending on whether the
	recipient is a transit provider, a State, or a planning entity (see below)

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

☐ All requirements set out in Chapter III (General Requirements)
☐ Service standards
○ Vehicle load for each mode
○ Vehicle headway for each mode
○ On time performance for each mode
○ Service availability for each mode

Service policies

- o Transit Amenities for each mode
- Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

Demographic and service profile maps and charts
Demographic ridership and travel patterns, collected by surveys
Results of their monitoring program and report, including evidence that the board or other
governing entity or official(s) considered, was aware of the results, and approved the
analysis
A description of the public engagement process for setting the "major service change
policy," disparate impact policy, and disproportionate burden policy
Results of service and/or fare equity analyses conducted since the last Title VI Program
submission, including evidence that the board or other governing entity or official(s)
considered, was aware of and approved the results of the analysis

Appendix B Current System Description

Current System Description

- Columbia County's current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.
- 2. Columbia County is a non-profit 509(a)(1) organization. Our organization is made up of 11 full-time employees, 2 part-time employees, and no volunteers. Our Transit Department Manager is responsible for all of the day-to-day operations of our organization and reports directly to our Board of County Commissioners (BCC). Our BCC is committed to this program and has, therefore, incorporated our service within the County's Public Transportation Program. Transportation services are provided in accordance with the BCC's approved Operations and Policy Manual. We will continue to operate at previous year 2013 service hours averaging 64 total fleet service hours per day or approximately 15,360 annual service hours (assuming 240 operating days).
- 3. Columbia County operates as a non-profit 509(a)(1) under the direct oversight of the BCC.
- 4. Columbia County's manager is responsible for training and management of our transportation program. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 40 hours of on-the-road driver's training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The Risk Management Services Manager is responsible for annual renewal of all liability insurance for both GDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Manager's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
- 5. Maintenance on all agency vehicles is provided by Columbia County Fleet Services Department. Columbia County Fleet Services employs only ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located at 5913 Euchee Creek Drive, Grovetown GA and are maintained by the manager. All records are maintained and retained for a minimum of four (4) years.
- 6. Our transportation department has a total of 13 employees that include: 8 full-time drivers, 2 part-time drivers, 1 administrator and 2 support staff.

- 7. Only transportation employees that have completed all of the required safety and driver's training requirements will be allowed to drive the agency vehicles.
- 8. Transportation services provided through our program are available to all county residents and the general public. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Approximately 90% of the medical trips we provide are to medical facilities out of the county; therefore, our out of county services are directed to the nearby highway corridors that surround this community for optimum efficiency of trip duration and the most convenient route. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes eight shuttle buses. Four of our vehicles are equipped for wheelchair service. We prioritize grouping trips and multi-loading to the maximum extent possible. We make 80 passenger trips per day on average and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.

Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter

Columbia County Board of Commissioners November 18, 2014 Meeting Agenda



Columbia County Board of Commissioners Agenda for Tuesday, November 18, 2014 at 6:00 p.m. Evans Government Center Auditorium Evans, Georgia

Commissioners:

Chairman - Ron C. Cross District 1 - Ronald L. Thigpen District 3 - Vacant District 2 - James E. Allen, III District 4 - William D. Morris

A. CALL TO ORDERChairman Cross D. ROLL CALL / QUORUMChairman Cross 1. [E1] November 4, 2014 The Chairperson of the Board of Commissioners shall prepare and present the agenda for each meeting of the Board of Commissioners. Sec 1-2-10 (b) Columbia County Code of Ordinances Anyone desiring to speak before the Board on an agenda item is limited to five minutes. If a group wishes to speak, one person must be designated to speak for the group. Please speak into the microphone and adjust as needed. A speaker form must be completed and submitted to the Commission Office by noon on the Wednesday prior to the meeting. You may view the video of the Board of Commissioners meeting on our website www.columbiacountyga.gov or Saturdays on WBEK at 10:00 a.m., Comcast channel 103 or WOW! channel 96 a. [G1a] Employee of the Month, Rachel Cooper, Detention Center Vice Chair Thigpen 2. Declaration Chairman Cross 3. Presentation Chairman Cross a. Safe Homes of Augusta......Greta von Unruh Rezening of 2406 William Few Parkway.......Atty. Jack Long and/or Atty. Andrew Tisdale Rezoning of 2406 William Few Parkway......Thomas M. Blanchard, Jr. The Board, upon a motion and second, shall vote on the items on the consent agenda collectively. A vote on the consent agenda shall constitute a vote on each and every item listed thereon. Upon a vote of a majority of the members of the Board present and voting approving the consent agenda items, each and every item shall stand approved as if voted on individually. Section 2-81(6) Columbia County Code of a. [H1a] Management Agreement, BMX Facility at Blanchard Woods Park b. [H1b] Monument and Public Art Applications c. [H1c] Animal Services Donation d. [H1d] Local Emergency Planning Committee Appointments e. [H1e] Presidential Disaster Declaration DR-4165 Grantee-Subgrantee Agreement Revision f. [H1f] Hazard Mitigation Grant Program Full Application g. [H1g] GDOT Title VI Program Plan h. [H1h] Bid 2014-045: Tandem Dump Truck for Storm Water Utility

Information provided to the Board of Commissioners is subject to open records laws as defined in Official Code of Georgia 50-18-70. Page 1 of 2

[H1i] Bid 2014-048: SCBA Air Paks for Fire Rescue

C-2 Columbia County

	Management and Financial Services Committee	Vice Chair Thigpen
	b. [H2b] RFP 2009-006: Misdemeanor Probation Services for Magistrate Court Option to Renew	s Final Contract
	c. [H2c] Resolution 14-1139: Appointing Members of the CSRA Unified Develop d. [H2d] AT&T PRI Voice Circuit Contract Renewal e. [H2e] Tower Site Land License Agreement, Verizon Wireless f. [H2f] Bid 2013-032: Sheriff's Administrative Office, Change Order 1 g. [H2g] Bid 2014-024: Wildwood Park Bath House Renovations, Deduct Chang 3. Development and Engineering Services Committee	e Order Commissioner Morris
l.	DEBATE AGENDA	
	The Chairman, after allowing sufficient time for debate and consideration, shall have the authority to call the question the question before the Board shall be immediately voted upon. Section 2-81(7) Columbia County Code of Ordinance	and when this is done, s.
	1. Unfinished Business	
	a. Community and Emergency Services Committee	
	b. Management and Financial Services Committee	
	 [I1c1] Ordinance 14-22: Deleting Chapter 18, Buildings and Building Con V Construction Board 	struction, Article
	d. Public Works Services Committee	
	2. New Business	
	Community and Emergency Services Committee	missioner i rey Allen
	Ilight Ordinance 14-21: Amending Chapter 18, Buildings and Building Co.	vice Chair Thigpen
	IX, Wireless Telecommunication Facilities	ion donori, 7 a noic
	2. [I2b2] Resolution 14-1135: Amending the Services and Fee Schedule for	Broadband Utility
	3. [I2b3] Bid 2014-050: Justice Center Terrazzo Floor Replacement, Rejection	n of Bids
	c. Development and Engineering Services Committee	Commissioner Morris
	 [I2c1] County Initiated Rezoning, 132 Langston Drive, S-1 to R-A [I2c2] Rezone 2406 William Few Parkway, R-A to R-2 	
	2. [12c2] Rezone 2406 William Few Parkway, R-A to R-2 3. [12c3] Rezone Parcels 025 030 and 031A, and a Portion of 015 044, R-A a	and C-1 to M-1
	4. [I2c4] Change of Conditions, Parcels 062 033E, 033F, 033G, 033H and a	
	5. [I2c5] Major PUD Revision, 5100 Pierce Court	
	6. [I2c6] Major PUD Revision, Multiple Parcels in The Retreat at Baker Place	Subdivision
	d. Public Works Services Committee	Chairman Cross
	e. Items Added Items need immediate action and have not gone before a committee 1. [I2e1] Board Appointments	
	2. [I2e2] Bid 2014-46: Military Memorial Wall	
J.	LEGAL MATTERS	ounty Attorney Driver
a 9		
K.	REQUESTS FOR REVIEW BY COMMITTEE	Chairman Cross
L.	PUBLIC COMMENTS AND PARTICIPATION	Chairman Cross
M.	EXECUTIVE SESSION	50-14-1 through 50-14-4
	b. [M1b] Health4Me2 Exempt Specialist Position	

Information provided to the Board of Commissioners is subject to open records laws as defined in Official Code of Georgia 50-18-70.

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The next scheduled meeting is Tuesday, December 2, 2014 at 6:00 p.m. in the Auditorium of Building A at

the Evans Government Center.

Columbia County Board of Commissioners November 18, 2014 Adoption Meeting Minutes

Columbia County Board of Commissioners Meeting Tuesday, November 18, 2014 **Evans Government Center Auditorium** Evans, Georgia

Chairman Ron C. Cross called the meeting to order at 6:00 p.m.

Others present at the meeting included:

Vice Chair Ronald L. Thigpen Division Directors:

Commissioner James E. Allen, III Paul Scarbary - Development Services Commissioner William D. Morris Barry Smith - Community and Leisure Commissioner Elect Doug Duncan Andrew Strickland - Planning Services County Administrator Scott Johnson Pam Tucker - Emergency and Operations

Deputy County Administrator Glenn Kennedy

County Attorney Chris Driver County Clerk Charlene Sharkey

Vice Chair Thigpen gave the invocation and Mr. Johnson led the pledge to the American flag.

Chairman Cross declared a quorum with four Commissioners present. 100%

Vice Chair Thigpen made a motion to approve the minutes of the November 4, 2014, Board of Commissioners meeting as presented. Commissioner Morris seconded the motion that passed unanimously.

Chairman Cross presented the agenda and added I2e1 Board Appointments; I2e2 Bid 2014-046: Military Memorial Wall; and amended the motion for H2a Service Agreements.

PRESENTATIONS

Rachel Cooper, Columbia County Sheriff's Office/Detention Center, was awarded Employee of the Month for November, 2014.

Greta Von Unruh, Safe Homes of Augusta, spoke the Commissioners about the shelter. She stated that Safe Homes is the only domestic violence program in a ten county region. The organization not only provides a safe haven for victims of domestic violence, but they also help those victims find homes to live in, jobs and education. Safe Homes is building a new, larger building so that they no longer have to turn victims away due to lack of space and beds. They have raised 2.4 million of the 3 million they need to build the facility.

Mr. Robert Rogers, 334 Westmont Drive, Martinez, expressed his concerns regarding dogs in the county. He is concerned about dogs barking and eliminating on his lawn and show quality camellias. He stated that the public should be educated on being respectful of the property of others who do not have pets.

CONSENT

Community and Emergency Services

Approved the Management Agreement for BMX Facility at Blanchard Woods Park with Blanchard Woods BMX Parents and Riders Association, Inc. of an initial one year term, December 1, 2014 through November 30, 2015 with unlimited options to renew for additional two year terms as agreed upon by the parties.

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C-4 Columbia County

Approved the application from the Augusta Council of Garden Clubs for a Blue Star Memorial marker to be placed on the right of way of Ronald Reagan Drive; and approve the application from the Augusta Striders Running Club for installation at the canal footbridge in Savannah Rapids Park of a bronze Fallen Soldier Memorial sculpture to honor Major Michael Donahue.

Accepted the October 8, 2014 donation of \$100.00 to Animal Services from R. W. Bussey Construction Company.

Reappointed the following citizens to serve on the Local Emergency Planning Committee for three year terms, January 1, 2015 through December 31, 2017:

Jim Adkins

2590 Willow Creek Ct. Evans, GA 30809

Trey Allen

County Commissioner P.O. Box 498 Evans, GA 30809

Vince Brogdon Gold Cross EMS P.O .Box 14848 Augusta, GA 30919

Chief Doug Cooper Columbia County Fire Rescue P.O. Box 204231 Martinez, GA 30907

Margaret Doss Columbia County Water Utility P.O. Box 498 Evans, GA 498

Christine Dron Club Car LLC P.O. Box 204658 Augusta, GA 30917

Robert Fields City of Harlem P.O. Box 99 Harlem, GA 30814

Wendell Freeman CSX Transportation 907 E. Boundary Augusta, GA 30901 Linda Graves

Columbia County Health Department

P.O. Box 99 Appling, GA 30802

Caroline Guay Dixie LP Gas 3711 Washington Rd. Martinez, GA 30907

Chief Gary Jones Harlem Department of Public Safety P.O. Box 99 Harlem, GA 30814

Capt. Wayne Kent Grovetown Department of Public Safety P.O. Box 120 Grovetown, GA 30813

Danny Kuhlmann, Special Operations Chief Columbia County Fire Rescue P.O. Box 204231 Martinez. GA 30907

Lindsey Land Atlanta Gas Light 4374 Wheeler Road Martinez, GA 30907

Harlem, GA 30814

Tripp Lonergan Harlem Department of Public Safety P.O. Box 99

Randy Maddox Georgia Power Company 4220 Evans To Lock Rd. Evans, GA 30809

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Shari Mendrick Columbia County Engineering Services P.O. Box 498 Evans, GA 30809

Vincent Pacchiana 307 Chamberlin Avenue Darling Hall, Building 33720, Rm. 300 FT. Gordon, GA 30905

Michael Rorick P.O. Box 204014 Martinez, GA 30917

Valerie Rowell Columbia News Times 4272 Washington Rd., Suite 3B Evans, GA 30809

Dave Schulte American Red Cross 1322 Ellis Street Augusta, GA 30901

Pam Stewart Columbia County Board of Education 5998 Columbia Rd. Grovetown, GA 30813

Industry Vacancy

Pam Tucker, Director Emergency & Operations Division P.O. Box 498 Evans, GA 30809

Miran Tyrrell John Deere Company 700 Horizon South Parkway Grovetown, GA 30813

Doug Varnadore A.B. Beverage Company P.O. Box 529 Evans, GA 30809

Jennifer Weeks 183 Seaton Avenue Grovetown, GA 30813

Rusty Welsh Emergency Management Agency P.O. Box 498 Evans, GA 30809

Major Rick Whitaker Columbia County Sheriff's Office 2273 County Camp Rd. Appling, GA 30802

Frank Williams Hepaco, Inc. 3105 Spring Grove Drive, Suite C2 Augusta, GA 30906

Approved the revision to the Presidential Disaster Declaration DR-4165 Grantee-Subgrantee Agreement for one additional disaster claim reimbursement from FEMA and GEMA in the amount of \$726,549.97 for debris removal and monitoring expenses incurred as a result of winter storm Pax.

Authorized staff to submit an application for the Georgia Emergency Agency (GEMA) Hazard Mitigation Grant Program, To provide \$59,160.00 towards the purchase of an emergency generator for the Sheriff's Substation on Ronald Reagan Drive.

Approved the Columbia County Title VI Program Plan to be effective upon approval.

Awarded Bid 2014-045: Tandem Dump Truck for Storm Water Utility to Yancey Truck Center for \$131,959.51. Funding: Storm Water Utility, 5215200 601082.

Awarded Bid 2014-048: SCBA Air-Paks for Fire Rescue to Municipal Emergency Services for \$29,451.00. Funding: 2322510-601081

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Management and Financial Services

Approved the following Provisions of Services agreements:

Fellowship of Christian Athletes
Augusta Warrior Project
Faithcare Clinic
Ronald McDonald House
Columbia County Cares
Safe Homes of Augusta
\$2000.00
\$1000.00
\$1000.00
\$1000.00
\$2000.00

Funding: (\$5500.00) 1011001 533035 53301; (\$3000.00) 1011001 533035 53302; (\$1500.00)

1011001 533035 53305

Renewed the agreement with CSRA Probation Services, Inc. as the Misdemeanor Probation Services provider for a final one year term, January 1, 2015 through December 31, 2015, and authorized Judge Jason Troiano to sign the agreement.

Approved Resolution 14-1139 appointing members of the CSRA Unified Development Authority. The resolution appoints Robert F. Bennett, 1000 Business Blvd, Evan, GA to serve a term to expire December 31, 2016 and Mr. Mark Wills, 3706 Inverness Way, Martinez, GA, to serve a term to expire December 31, 2015.

Approved the renewal of the AT&T PRI Voice Circuit Contract for a two year term and an annual cost of \$85,560.00. Funding: General Fund, 101 1005 533135.

Approved the Tower Site Land License agreement with Verizon Wireless of the East, L.P. for a one time execution fee paid to the County in the amount of \$5,000.00 and annual rent as follows:

 Initial 5 Year Term
 \$210,000.00

 Second 5 Year Term
 \$229,673.22

 Third 5 Year Term
 \$266,254.20

 Fourth 5 Year Term
 \$308,661.60

 Fifth 5 Year Term
 \$357,823.39

Rent is paid in equal monthly installments on the first day of the month. The initial term is five years beginning December 1, 2014 through November 30, 2019 with an option to renew for four additional five year periods.

Approved change order 1 to the agreement with RCN Contracting, Inc. for Bid 2013-032: Sheriff's Administrative Office project. The change order extends the contract 21 days for a final completion date of August 3, 2014.

Approved the change order to the agreement with J. H. Cleveland Construction for Bid 2014-024: Wildwood Park Bathhouse Renovations. The change order in the amount of (-\$3,38.00) reduces the contract for a final cost of \$88,162.00; and extends the contract five days for a final completion date of October 10, 2014. Funding: 2007 GO Bond - Wildwood Park, 61102-19-015-601.

In accordance with Columbia County Code of Ordinances Section 2-81(6), the preceding items were voted on collectively. Vice Chair Thigpen made a motion to approve the consent agenda as presented and Commissioner Morris seconded the motion that passed unanimously.

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OLD BUSINESS

Development and Engineering Services

Commissioner Morris made a motion to approve as a second and final reading Ordinance 14-22 deleting Chapter 18, Buildings and Building Construction, Article V Construction Board; repealing any conflicting ordinances and establishing an effective date. Commissioner Allen seconded the motion and discussion followed. The motion passed unanimously.

NEW BUSINESS

Management and Financial Services

Vice Chair Thigpen made a motion to approve as a first reading Ordinance 14-21: amending Chapter 18, Buildings and Building Construction, Article IX, Wireless Telecommunication Facilities, of the Code of Ordinances of Columbia County, Georgia, to provide for an effective date and to repeal any conflicting ordinances. Commissioner Morris seconded the motion and discussion followed. The motion passed unanimously.

Vice Chair Thigpen made a motion to approve as a first reading Resolution 14-1135 amending the services and fee schedule for Broadband Utility; to repeal any conflicting resolutions and to establish an effective date. Commissioner Allen seconded the motion and discussion followed. The motion passed unanimously.

Vice Chair Thigpen made a motion to reject the bids received for Bid 2014-050: Justice Center Terrazzo Floor Replacement and authorize staff to solicit bids outside of the standard procurement procedure in accordance with the Columbia County Procurement Policy 603.1 III (6)(b) in order to prevent any additional closures or rescheduling of Justice Center related to rendering government services during remodeling. Commissioner Morris seconded the motion and discussion followed. The motion passed unanimously.

Commissioner Morris made a motion to rezone 132 Langston Drive from S-1 (Special District) to R-A (Residential Agriculture District). Vice Chair Thigpen seconded the motion that passed unanimously.

Commissioner Morris made a motion to accept the withdraw from Blanchard and Calhoun Real Estate Co., without prejudice, the application to rezone 2406 William Few Parkway from R-A (Residential Agricultural District) to R-2 (Single-family Residential District). Commissioner Allen seconded the motion and discussion followed. The motion passed unanimously.

Dr. Judith E. Gordon expressed her concerns about the development of land around Heggies Rock. She stated that, when the sign was posted for the rezoning of 2406 William Few Parkway, she was not able to read it because it was too small and there is nowhere to pull over along the side of the road to get out to read the sign. She suggested larger signs. She also suggested that those who are involved in making decisions regarding the zoning of properties in Columbia County should make site visits and speak to the surrounding landowners.

Commissioner Morris made a motion to rezone Tax Map 025, Parcels 030 and 031A, and a portion of Tax Map 015 Parcel 044 from R-A (Residential Agricultural District) and C-1 (Neighborhood Commercial District) to M-1 (Light Industrial District), with the following conditions:

Planning: A plat indicating the extent of the rezoning request must be submitted to the Planning Department within 30 days of approval by the Board of Commissioners.

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<u>Traffic Engineering</u>: Access to subject property is regulated by Georgia Department of Transportation. Contact District 2 office, Tennille GA, at (478) 552-4621 for permitting information. A copy of the GDOT permit or a letter of intent from GDOT to issue a driveway permit is required to be on file with the Plan Review Department prior to site plan approval.

Vice Chair Thigpen seconded the motion and discussion followed. The motion passed unanimously.

Commissioner Morris made a motion to approve the Change of Conditions for Tax Map 062 Parcels 033E, 033F, 033G, 033H and a portion of 033J, with the following condition:

Planning: All other conditions of approval adopted by the Board of Commissioners on October 18, 2011 still apply.

Commissioner Allen seconded the motion that passed unanimously.

Commissioner Morris made a motion to approve the Major Revision of the PUD (Planned Unit Development), for 5100 Pierce Court. Conditions adopted as part of the original PUD approval shall apply. Vice Chair Thigpen seconded the motion and discussion followed. The motion passed unanimously.

Commissioner Morris made a motion to approve Major Revision of the PUD (Planned Unit Development) for Tax Map 051 Parcels 004C, 003J (remainder of), 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, and 776 located in The Retreat at Baker Place. All conditions adopted as part of the October 2012 approval of RZ12-10-02 still apply. Commissioner Allen seconded the motion and discussion followed. The motion passed unanimously.

Items Added at the Meeting

Commissioner Morris made a motion to appoint the following individuals to serve on the Columbia County Development Advisory Committee to serve a one year term expiring December 31, 2015:

Residential Contractor – Mark Ivey
Commercial Contractor – Steve Clifton
Licensed Subcontractor – Rob Zapata
Developer – Bill Boatman
Engineer – Robert Titus
Architect and Design – Nathan Vick
Site Contractor – Mickey Lonergan
Citizens at Large (non-voting) – Tim Tyler and Oliver Owens

Vice Chair Thigpen seconded the motion and discussion followed. The motion passed unanimously.

Vice Chair Thigpen made a motion to award Bid 2014-046: Military Memorial Wall to RCN Contracting, Inc. for \$166,039.00 and authorize any shortfall in funding to be allocated from the 2006-2010 SPLOST. Commissioner Allen seconded the motion that passed 3-1. Commissioner Morris opposed.

EXECUTIVE SESSION

The Commissioners did not adjourn to executive session.

Vice Chair Thigpen made a motion to reclassify the Manager II, Grade 24 position in the Senior Center to Manager I, Grade 23 to become effective December 27, 2014. Funding: General Fund, 1011716

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511001. Commissioner Morris seconded the motion and discussion followed. The motion passed unanimously.

Vice Chair Thigpen made a motion to approve a new position for an Exempt Specialist V, Grade 22 position to provide fitness and nutrition education for county employees as part of the Health4Me2 program at an entry salary of \$27,518.00 for thirty working hours per week, including a Category B vehicle allowance and \$480.00 annual cell phone allowance to be effective with the pay period beginning November 30, 2014. Funding: Medical Fund, 6016010 511001. Commissioner Morris seconded the motion and discussion followed. The motion passed unanimously.

There was no further business to discuss; therefore, Commissioner Morris made a motion to adjourn the meeting at 6:37 p.m. and Commissioner Allen seconded the motion that passed unanimously.

Signature on file -(December 2, 2014)
Minutes approved by Chairman Ron C. Cross

<u>Signature on file -(December 2, 2014)</u>
Minutes attested by County Clerk Charlene R. Sharkey

GDOT Concurrence Letter

Russell R. McMurry, P.E., Commissioner



GEORGIA DEPARTMENT OF TRANSPORTATION

One Georgia Center, 600 West Peachtree Street, NW Atlanta, Georgia 30308 Telephone: (404) 631-1000

May 4, 2015

Pam Tucker, Director Columbia County Emergency & Operations Division Physical Address: 650-B Ronald Reagan Drive Mailing Address: Post Office Box 498

Dear Ms. Tucker,

Thank you for the recent submission of the Columbia County Transit Title VI Plan. This Title VI Program submission is required pursuant to Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53 Section 5332 of the United States Code; and the Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

Upon review of your Title VI Program submission and under the guidance provided in *FTA circular 4702.1B*, we have determined that your submission [does] meet the requirements as set forth in the circular. However, please provide verification of the Title VI presence on your web site as soon as possible.

Thank you for your ongoing cooperation in meeting all of the FTA Civil Rights Program requirements. Should you need assistance, or have any questions regarding the comments above please do not hesitate to contact Ms. Nadara Wade, our FTA Title VI Program Liaison, directly at (404) 631-1231 or at nwade@dot.ga.gov.

Sincerely,

Crystal Odum Ford, Transit Division Manager

Cupild Od for

cc: Nadara L. Wade-Public Transportation Coordinator DBE/Drug and Alcohol/Title VI FTA Compliance Antoine Hawkins, Transit Planner Theo Letman, Urban Group Leader

Appendix D Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

Columbia County

- Columbia County operates its programs and services without regard to race, color, and
 national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she
 or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a
 complaint with Columbia County.
- For more information on Columbia County's civil rights program, and the procedures to file a complaint, contact 311 or 706-868-3375; TTY: 706-868-3375; or email 311@columbiacountyga.gov; or visit our administrative office at 630 Ronald Reagan Drive, Evans GA 30809. For more information, visit www.columbiacountyga.gov.
- If information is needed in another language, contact 1-888-808-9008, PIN 11420233
- Si se necesita información en otro idioma, comuníquese con 1-888-808-9008, PIN 11420233
- You may also file your complaint directly with the FTA at: Federal Transit Administration Office
 of Civil Rights Attention: Title VI Program Coordinator, East Building, 5th Floor TCR
 1200 New Jersey Ave., SE, Washington, DC 20590

Appendix E Title VI Complaint Form

Title VI Complaint Form

Section I:					
Name:					
Address:					
Telephone (Home):		Telephone ((Work):		
Electronic Mail Address:		1			
Accessible Format	Large Print		Audio Tape		
Requirements?	TDD		Other		
Section II:					
Are you filing this complaint on	your own behalf?		Yes*	No	
*If you answered "yes" to this q	uestion, go to Section III.				
If not, please supply the name a you are complaining:	ind relationship of the persor	n for whom			
Please explain why you have file	ed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. No				No	
Section III:					
I believe the discrimination I exp	perienced was based on (che	ck all that apply	·):		
[] Race [] Co	lor	[] National Origin			
[] Disability [] Fa	mily or Religious Status	or Religious Status [] Other (explain)			
Date of Alleged Discrimination (Month, Day, Year):					
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.					
Section IV					
Have you previously filed a Title	VI complaint with this agend	cy?	Yes	No	

Section V			
Have you filed thi	s complaint with any other Federal, State, or local agency, or with any Federal or State court?		
[] Yes	[] No		
If yes, check all th	at apply:		
[] Federal Agency	r:		
[] Federal Court _	[] State Agency		
[] State Court	[] Local Agency		
Please provide inf	formation about a contact person at the agency/court where the complaint was filed.		
Name:			
Title:			
Agency:			
Address:			
Telephone:			
Section VI			
Name of agency of	omplaint is against:		
Contact person:			
Title:			
Telephone numbe	er:		
You may attach any written materials or other information that you think is relevant to your complaint. Signature and date required below			
Signature	Date		
Please submit th	nis form in person at the address below, or mail this form to:		
Marcia Lowry			
	y Board of Commissioners		
County Administ			
Human Resource 706-868-3300	es Manager/EEO		
	gan Drive, Building B, Evans, GA 30809		

Appendix F Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for Columbia County was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Columbia County. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Columbia County services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Columbia County also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about Columbia County and its operations. The goals for this PPP include:

- Inclusion and Diversity: Columbia County will proactively reach out and engage low-income, minority, and LEP populations for the Columbia County service area so these groups will have an opportunity to participate.
- Accessibility: All legal requirements for accessibility will be met. Efforts will be made to enhance the
 accessibility of the public's participation physically, geographically, temporally, linguistically and
 culturally.
- Clarity and Relevance: Issues will be framed in public meetings in such a way that the significance and
 potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or
 services will be described in language that is clear and easy to understand.
- Responsive: Columbia County will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- Tailored: Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible**: The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of Columbia County. Columbia County intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

Columbia County will conduct community meetings and listening sessions as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Columbia County website (www.columbiacountyga.gov) and all feedback on the site will be recorded and passed on to Columbia County management. The public will also be able to call the Columbia County office at 706-868-3375 or 311 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Columbia County management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For community meetings and other important information, Columbia County will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posters or flyers in transit center
- Posting information on website
- Press releases and briefings to media outlets
- Social Media
- Email Blasts
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the "safe harbor" criteria.

Public Hearing

Columbia County conducts public meetings allowing for public comment and participation with the calendar set by the Columbia County Board of Commissioners. All meeting dates are released in advance to local media and posted on the www.columbiacountyga.gov website.

Appendix G Language Assistance Plan (LAP)

I. Introduction

Columbia County operates a transit system within Columbia County, GA. The Language Assistance Plan (LAP) has been prepared to address Columbia County's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Columbia County service area there are 4,651 residents or 3.99% who describe themselves as <u>not</u> able to communicate in English "very well" (Source: US Census). Columbia County is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Columbia County has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007) " (hereinafter "Handbook"), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 of August 16, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6). Additionally recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP (Handbook, page 6). These provisions are included in FTA Circular 4702.1B in Paragraph 9 of Chapter III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available. It is important for Columbia County be able to communicate effectively with all of its riders. When Columbia County is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Columbia County is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that Columbia County undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request

- Translation: Providing timely translation of important documents
- Staffing: Identifying Columbia County staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Columbia County services and identify needs for language assistance. This analysis is based on the "Four Factor Analysis" presented in the Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

- 1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Columbia County program, activity or service.
- 2. The frequency with which LEP persons come in contact with Columbia County programs, activities or services.
- 3. The nature and importance of programs, activities or services provided by Columbia County to the LEP population.
- 4. The resources available to Columbia County and overall costs to provide LEP assistance

a. <u>Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population</u>

Of the 124,665 residents in the Columbia County service area 4,657 residents describe themselves as speaking English less than "very well". People of Hispanic descent are the primary LEP persons likely to utilize Columbia County services. For the Columbia County service area, the American Community Survey of the U.S. Census Bureau shows that among the area's population 96.0% speak English "very well". For groups who speak English "less than very well", 3.69.00% speak Spanish and 1.04% speak Korean.

Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the Columbia County service area.

b. <u>Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services</u>

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Columbia County has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that there is a less than four percent probability of

routine encounters or service requests from LEP individuals within the service population who speak Spanish. Phone inquiries and staff survey feedback indicated that Columbia County dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 13 years, Columbia County has had zero requests for translated documents.

c. <u>Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the</u> Recipient to People's Lives

Public transportation and regional transportation planning is vital to many people's lives. According to the Department of Transportation's *Policy Guidance Concerning Recipient's Responsibilites to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

An analysis of ridership and trip data was conducted to asses the areas of greatest use and to identify areas of potential growth or underserved populations. The majority of Columbia County's ridership is over the age of 60 and has a medical need for public transportation. The majority of Columbia County's ridership uses our services for medical appointments. No requests from LEP individuals has been documented during the past three years of services.

d. Factor 4: The Resources Available to the Recipient and Costs

Columbia County assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: LanguageLine Solutions, and LanguageLine Interpretor services. Columbia County provides a reasonable degree of services for LEP populations in its service area.

III. Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

- 1. Identifying LEP individuals who need language assistance
- 2. Providing language assistance measures
- 3. Training staff
- 4. Providing notice to LEP persons
- 5. Monitoring and updating the plan

The five elements are addressed below.

a. Element 1: Identifying LEP Individuals Who Need Language Assistance

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Columbia County has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 90.36%

of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (4.0%). Of those who primary spoken language is Spanish, approximately 1.8% identify themselves as speaking less than "very well". Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than "very well" account for 3.99% of the service area population.

Columbia County may identify language assistance need for an LEP group by:

- 1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
- 2. Having Census Bureau Language Identification Flashcards available at Columbia County Meetings. This will assist Columbia County in identifying language assistance needs for future events and meetings.
- 3. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to Columbia County management to follow-up.
- 4. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

b. Element 2: Language Assistance Measures

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

Columbia County has undertaken the following actions to improve access to information and services for LEP individuals:

- 1. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
- 2. Provide Language Identification Flashcards onboard transit vehicles and in the Columbia County offices.
- 3. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

Columbia County will utilize the demographic maps provided in Appendix I in order to better provide the above efforts to the LEP persons within the service area.

c. Element 3: Training Staff

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of Columbia County, the most important staff training is for Customer Service Representatives and Transit Drivers.

The following training will be provided to Customer Service Representative:

- 1. Information on Title VI Procedures and LEP responsibilities
- 2. Use of Language Identification Flashcards
- 3. Documentation of language assistance requests
- 4. How to handle a potential Title VI/LEP complaint

d. Element 4: Providing Note to LEP Persons

Columbia County will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in Columbia County office lobby, and on buses. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

e. Element 5: Monitoring and Updating the Plan

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether Columbia County's financial resources are sufficient to fund language assistance resources needed

Columbia County understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. Columbia County is open to suggestions from all sources, including customers, Columbia County staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

IV. Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Columbia County service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Columbia County does have LEP groups which speak English less than "very well" which exceed either 5.0% or 1,000 person

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Columbia County may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

Appendix H Operating Area Language Data: Columbia County Service Area

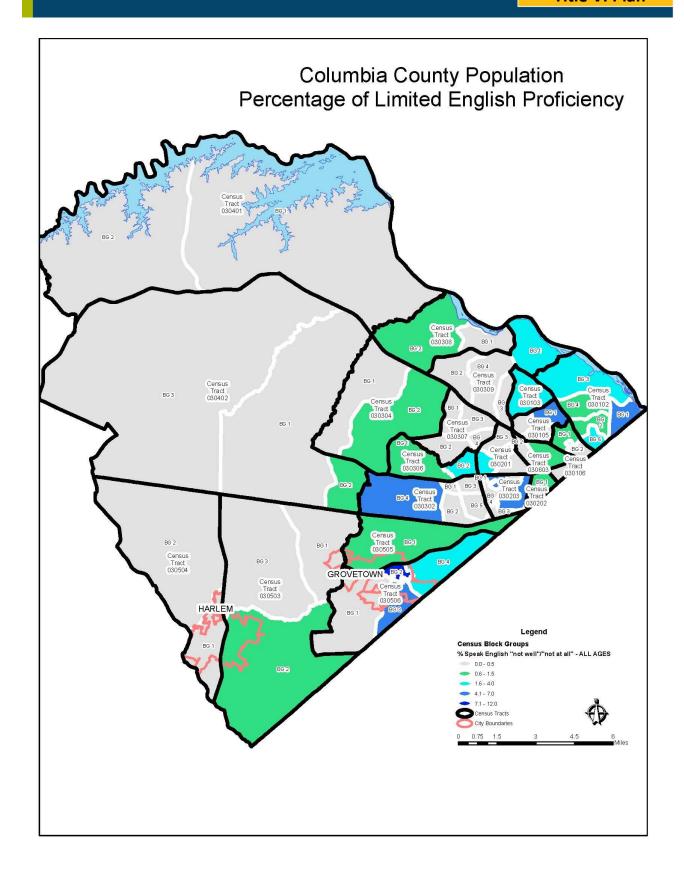
<u>Language</u>	County	Percent of Population
Total	116,424	100.0
Speak only English	104,906	90.1
Spanish or Spanish Creole	4,708	4.0
Speak English "very well"	2,575	2.2
Speak English less than "very well"	2,133	1.8
French (incl. Patois, Cajun)	179	.15
Speak English "very well"	179	.15
Speak English less than "very well"	0	0.0
French Creole	0	0.0
Speak English "very well"	0	0.0
Speak English less than "very well"	0	0.0
Italian	11	0.0
Speak English "very well"	11	0.0
Speak English less than "very well"	0	0.0
Portuguese or Portuguese Creole	24	0.0
Speak English "very well"	24	0.0
Speak English less than "very well"	0	0.0
German	942	.81
Speak English "very well"	854	.73
Speak English less than "very well"	88	0.0
Yiddish	13	0.0
Speak English "very well"	13	0.0
Speak English less than "very well"	0	0.0
Other West Germanic languages	23	0.0
Speak English "very well"	23	0.0
Speak English less than "very well"	0	0.0
Scandinavian languages	0	0.0
Speak English "very well"	0	0.0
Speak English less than "very well"	0	0.0
Greek	17	0.0
Speak English "very well"	17	0.0
Speak English less than "very well"	0	0.0
Russian	58	0.0
Speak English "very well"	22	0.0
Speak English less than "very well"	36	0.0
Polish	87	0.0
Speak English "very well"	65	0.0
Speak English less than "very well"	22	0.0
Serbo-Croatian	34	0.0
Speak English "very well"	34	0.0
Speak English less than "very well"	0	0.0
Other Slavic Languages	18	0.0
Speak English "very well"	18	0.0

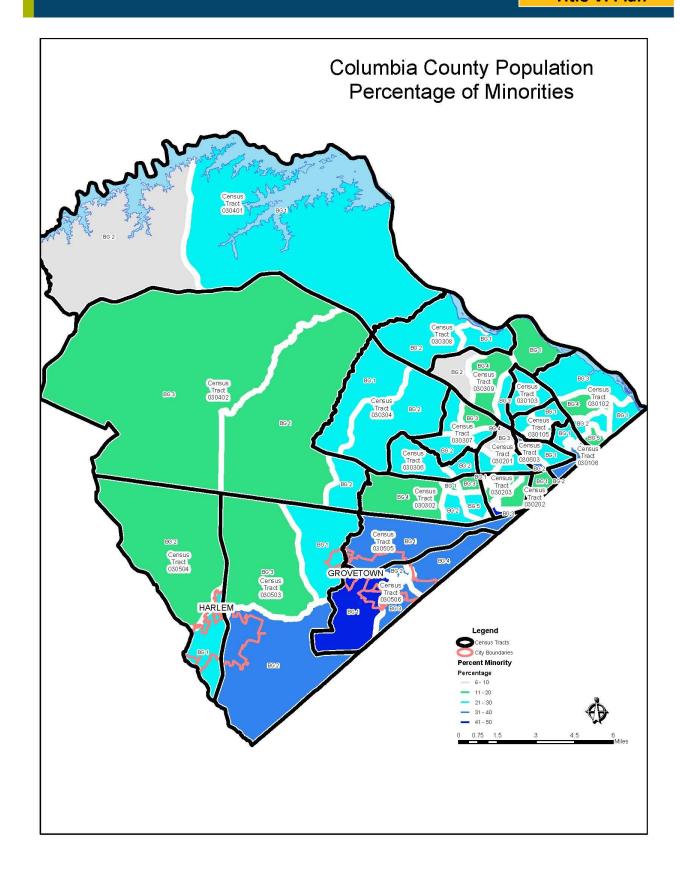
Language	County	Percent of Population
Speak English less than "very well"	0	0.0
Armenian	159	.14
Speak English "very well"	54	0.0
Speak English less than "very well"	105	.09
Persian	338	.29
Speak English "very well"	82	0.0
Speak English less than "very well"	256	.21
Gujarati	207	.18
Speak English "very well"	61	0.0
Speak English less than "very well"	146	.13
Hindi	375	.32
Speak English "very well"	236	.20
Speak English less than "very well"	139	.12
Urdu	80	0.0
Speak English "very well"	43	0.0
Speak English less than "very well"	37	0.0
Other Indic languages	442	.38
Speak English "very well"	324	.28
Speak English less than "very well"	118	.10
Other Indo-European Languages	93	0.0
Speak English "very well"	64	0.0
Speak English less than "very well"	29	0.0
Chinese	1,114	.96
Speak English "very well"	557	.48
Speak English less than "very well"	557	.48
Japanese	93	0.0
Speak English "very well"	44	0.0
Speak English less than "very well"	49	0.0
Korean	1,047	.90
Speak English "very well"	410	.35
Speak English less than "very well"	637	.55
Mon-Khmer, Cambodian	0	0.0
Speak English "very well"	0	0.0
Speak English less than "very well"	0	0.0
Hmong	0	0.0
Speak English "very well"	0	0.0
Speak English less than "very well"	0	0.0
Thai	27	0.0
Speak English "very well"	27	0.0
Speak English less than "very well"	0	0.0
Laotian	0	0.0
Speak English "very well"	0	0.0
Speak English less than "very well"	0	0.0
Vietnamese	278	.24
Speak English "very well"	118	.10

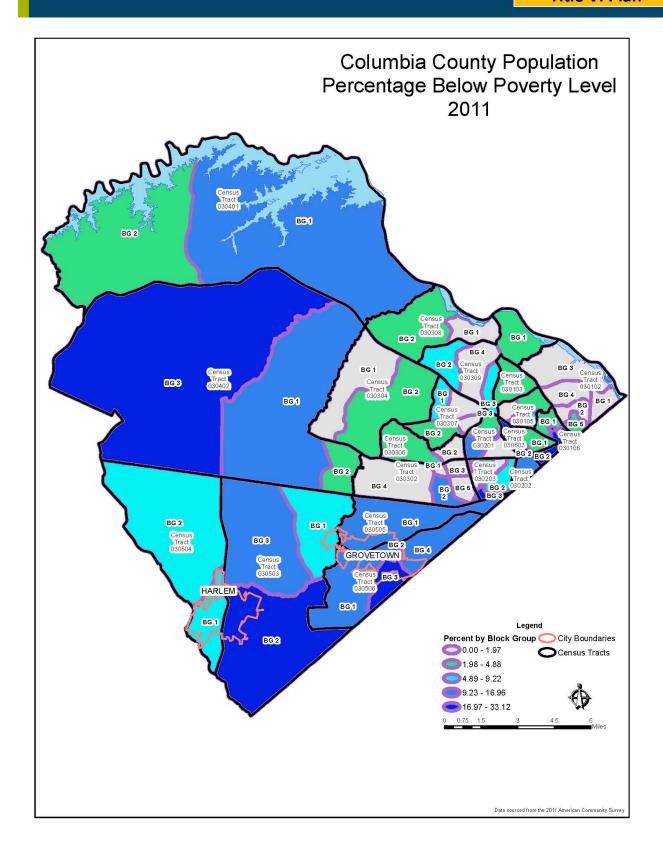
Title VI Plan

<u>Language</u>	<u>County</u>	Percent of Population
Speak English less than "very well"	160	.14
Other Asian languages	195	.17
Speak English "very well"	195	.17
Speak English less than "very well"	0	0.0
Tagalog	246	.21
Speak English "very well"	201	.17
Speak English less than "very well"	45	0.0
Other Pacific Island languages	102	.10
Speak English "very well"	68	0.0
Speak English less than "very well"	34	0.0
Navajo	18	0.0
Speak English "very well"	18	0.0
Speak English less than "very well"	0	0.0
Other Native American languages	16	0.0
Speak English "very well"	16	0.0
Speak English less than "very well"	0	0.0
Hungarian	17	0.0
Speak English "very well"	0	0.0
Speak English less than "very well"	17	0.0
Arabic	240	.21
Speak English "very well"	197	.17
Speak English less than "very well"	43	0.0
Hebrew	44	0.0
Speak English "very well"	44	0.0
Speak English less than "very well"	0	0.0
African languages	227	.19
Speak English "very well"	227	.19
Speak English less than "very well"	0	0.0
Other and unspecified languages	46	0.0
Speak English "very well"	46	0.0
Speak English less than "very well"	0	0.0

Appendix I Demographic Maps







Appendix J Title VI Equity Analysis

Columbia County is not required at this time and has not preformed Title VI Equity Analysis

Appendix K Text Formatting Palette

Formatting/Styles

Report margins:

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Top margin = 1"

Bottom margin = 1"

Left margin = 1.25"

Right margin = .75"
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Heading levels:

Heading One

Calibri 14 pt bold; left-aligned; paragraph spacing = 10 pt after; line spacing multiple 1.15

Heading 2

Calibri 13 pt bold; left-aligned; line spacing-multiple 1.15; paragraph spacing = 10 pt after

Body Text: Calibri 11; fully-justified text; line spacing-multiple 1.15; 10 pt. after.

Bulleted List: Calibri 10 pt; line spacing-multiple 1.15; paragraph spacing = 10 pt after

General Instructions

How to Update Table of Contents:

Right click on table of contents and choose *update field*—you will then have the option of updating the entire table of contents or just the page numbers.

How to Add New Section:

Under *Page Layout Menu*, choose *Breaks*, then *Section Break*, then *Next Page*. Heading numbers should update automatically in new section.